

REMARKS

New claims 15 – 19 are supported by the specification as filed, for example at paragraphs 69 and 74 – 79. No new matter is added. Consideration of these claims on the merits is respectfully requested.

The previous claims were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,415,323 (hereinafter “McCanne”) in view of U.S. Patent 6,611,872 (hereinafter “McCanne-2”). McCanne relates to a redirection system for handling client requests. McCanne-2, on the other hand, relates to application-level multicasting in a router, and is cited for teaching a process of mapping a URL to a corresponding unicast address. See Advisory Action at p. 3.

In the redirection scheme described by McCanne client requests are made to an anycast address, at which either the content is retrieved or the client is redirected to another source to obtain the content. See McCanne at col. 15, ll. 53 et seq. In the case where the requested content is available through a multicast address, the above scheme is modified so that the client is provided with the address of the multicast group. McCanne at col. 19, ll. 49 et seq. Contrary to the contention in the Advisory Action, this process does not involve mapping a client request of a URL to a unicast address. Instead, McCanne indicates that it is only service node-to-service node transmissions that are made using unicast addresses. *Id.*

Importantly, the initial request made by the client in the McCanne scheme is a request to an anycast address. This is so because in the McCanne scheme the applicable address space is populated with anycast addresses. Hence, the URLs involved in such requests include references to anycast addresses. McCanne at col. 9, ll. 7 – 10.

The Office Action and the Advisory Action contemplate combining the URL-to-unicast address mapping process taught by McCanne-2 to the scheme described by McCanne. However, if such a process were adopted in the McCanne system, it is unclear how that unicast address would in fact be used. For example, the URL of McCanne is actually an anycast address (see

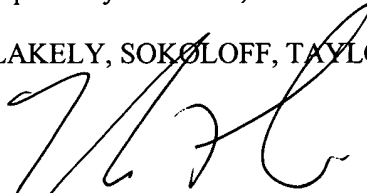
above). So, using the combination suggested by the Office Action, that anycast address would then be mapped to a unicast address (as taught by McCanne-2). But unicast addresses are not utilized in the address space overseen by the redirectors described by McCanne, so the request to the unicast address would go unresolved. Even if the address could be resolved, the net effect would be to use an anycast address as a unicast address (i.e., after the mapping).

In contrast, claim 15 recites a method wherein the unicast address is used as an anycast address. This is substantially different from any procedure that would result from a combination of the McCanne and McCanne-2 processes and so the present claims should be deemed patentable over this combination of references.

If there are any deficiencies of fees associated with this communication, please charge our Deposit Account No. 02-2666.

Respectfully submitted,

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